

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
 -v.- :
 :
GULNOZA RAKHMANOVA, :
:
 Defendant. :
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INFORMATION

22 Cr. 114 ()

COUNT ONE

(Conspiracy to Operate an Unlicensed
Money Transmitting Business)

The United States Attorney charges:

1. From at least on or about January 2018, up to and including April 2021, in the Southern District of New York and elsewhere, GULNOZA RAKHMANOVA, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, operation of an unlicensed money transmitting business, in violation of Title 18, United States Code, Sections 1960(a), (b)(1)(A), and (b)(1)(B).

2. It was a part and an object of the conspiracy that GULNOZA RAKHMANOVA, the defendant, and others known and unknown, knowingly conducted, controlled, managed, supervised, directed, and owned all and part of an unlicensed money transmitting business affecting interstate and foreign commerce, which (a) was operated without an appropriate money transmitting license in a State where such operation was punishable as a misdemeanor and a felony under

State law, and (b) failed to comply with the money transmitting business registration requirements under Section 5330 of Title 31, United States Code, and regulations prescribed under such section, to wit, RAKHMANOVA used a company owned and controlled by a co-conspirator in New York, New York ("Company-1"), to transmit money from, through, and out of the United States, including money transmitted through the Southern District of New York, without an appropriate state license, which conduct was punishable as a misdemeanor under New York law, and without meeting the Federal registration requirements set forth for money transmitting businesses.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, was committed in the Southern District of New York and elsewhere:

a. On or about February 4, 2021, GULNOZA RAKHMANOVA sent a Telegram message to a confidential source ("CS-1") with instructions to transmit funds to a bank account in New York, NY (the "Company-1 Bank Account"), and per those instructions, on or about February 4, 2021, \$51,319 were transmitted from an FBI covert account to the Company-1 Bank Account.

b. On or about February 18, 2021, GULNOZA RAKHMANOVA sent a Telegram message to CS-1 attaching an invoice

for \$40,200 with instructions to transmit funds to the Company-1 Bank Account, and per those instructions, on or about February 19, 2021, \$40,200 were transmitted from an FBI covert account to the Company-1 Bank Account.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Information, GULNOZA RAKHMANOVA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;


b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(18 U.S.C. § 371.)

DAMIAN WILLIAMS
United States Attorney